



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Timothy Teepell, Treasurer  
The Madison Project Inc. Fund  
119 C Street, SE, #Basement  
Washington, DC 20003

NOV 29 2000

Identification Number: C00298000

Reference: Amended April Quarterly Report (1/1/00-3/31/00) dated 7/13/00

Dear Mr. Teepell:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions made on behalf of what appear to be federal candidates. The original payments for the goods and services have been itemized as operating expenditures and included in the total for Line 21 of the Detailed Summary Page. In addition, there is no disclosure of any activity on Line 23 (Contributions to Federal Candidates and Other Political Committees). This method of reporting does not accurately disclose your committee's activity breakdown on the Detailed Summary Page.

Please amend your report to disclose this activity on Line 23 of the Detailed Summary Page. This method of reporting will provide clear and accurate disclosure of the total amount of contributions to federal candidates (including in-kind contributions) on the public record. Please refer to the enclosed sample of a properly disclosed in-kind contribution.

Furthermore, please provide the office sought including state and congressional district, if applicable, for each contribution made. 11 CFR (b)(3)(ii) and (v)

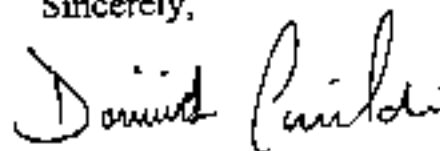
-Schedules A and B of your report disclose earmarked contributions. If the contributions passed through your committee's account (conduit's check),

each must be reflected on Lines 11(a)(i) and 23, itemized on Schedules A and B, respectively, regardless of the amount. If the earmarked contributions were forwarded in the form of the contributor's check, they should be disclosed as memo entries on Schedules A and B. For disclosure purposes, the name and mailing address for each contributor must be provided, and where the contribution exceeds \$200, the individual's occupation and name of employer must also be itemized. Please amend your report accordingly. 11 CFR §110.6(c)(1)(v)

-Schedule B discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

## 4. Itemized Disbursements: Schedule B

### When to Itemize Disbursements

#### Regardless of Amount

Several types of disbursements must be itemized regardless of amount:

- Contributions to candidates and political committees;
- Loan repayments;
- Loans made by the committee; and
- Transfers to affiliated committees.

Note that refunds of contributions (Line 28 on the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained earlier in this chapter.<sup>2</sup>

**Other Disbursements: \$200 Threshold**  
A disbursement that does not fall under one of the categories listed above (such as a donation to a nonfederal candidate) must be itemized if it exceeds \$200 when aggregated with other disbursements made to the same payee during the calendar year.

### How to Itemize Disbursements

#### Separate Categories of Disbursements

Before beginning to itemize the committee's disbursements, separate them into the categories listed on the Detailed Summary Page ("Operating Expenses," "Contributions to Federal Candidates," etc.; an illustration of the completed Detailed Summary Page appears on page 35). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by entering the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule. The appropriate category of disbursement may also be written at the top of each page.

2. If the committee uses funds drawn from federal and nonfederal accounts to conduct an activity that supports both federal and nonfederal candidates, the committee must follow the allocation rules. See Chapter 10.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

#### Itemized Information

Itemized disbursement information includes:

- Name of payee;
- Address of payee;
- Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B instructions and 104.3(b)(3)(i)(B));
- Date of payment; and
- Amount. 104.3(b)(3); 104.9.

#### Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations below.

## CONTRIBUTIONS TO CANDIDATES

| SCHEDULE B  |  | ITEMIZED DISBURSEMENTS   |  | SEE INSTRUCTIONS FOR THE DETAILED SUMMARY PAGE |  | PAGE 1 OF 1                             |
|---|--|--|--|--|--|---|
| Contributions to Federal Candidates   |  |  |  | FOR LINE NUMBER 25                             |  |   |
| Any information appearing on such Reports and Statements may not be sold or used by any person for the purpose of securing contributions or for confidential purposes, other than using the name and address of any bona fide committee to solicit contributions from such committee. |  |  |  |  |  |   |
| NAME OF COMMITTEE (in Full)   |  |  |  |  |  |   |
| Fund for a Better Government  |  |  |  |  |  |   |
| A. Full Name, Mailing Address and ZIP Code  |  | Purpose of Disbursement  |  | Date (month, day, year)                        |  | Amount of Each Disbursement This Period |
| Holiday Plaza Hotel<br>1100 Burlington Avenue<br>City, State ZIP  |  | reception for Bob Brock, House candidate, 8th (State)  |  | 7/10/94  |  | \$879.70 (21-kind)                      |
|   |  | Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) |  |  |  |   |

See pages 10 and 25 for information on how to determine the value of an in-kind contribution.

|   |  |  |  |                         |  |   |
|---|--|--|--|-------------------------|--|---|
| B. Full Name, Mailing Address and ZIP Code                          |  | Purpose of Disbursement  |  | Date (month, day, year) |  | Amount of Each Disbursement This Period |
| Citizens for Stan Smythe<br>5470 Rushmore Street<br>City, State ZIP |  | Stan Smythe, House candidate, 11th (State)   |  | 7/15/94                 |  | \$160.00                                |
|   |  | Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) |  |                         |  |   |

Itemize contributions to federal candidates regardless of amount.

|  |  |  |  |                         |  |   |
|--|--|--|--|-------------------------|--|---|
| C. Full Name, Mailing Address and ZIP Code               |  | Purpose of Disbursement  |  | Date (month, day, year) |  | Amount of Each Disbursement This Period |
| Taylor for Congress<br>11 Main Street<br>City, State ZIP |  | Maria Taylor, House candidate, 3rd (State)   |  | 8/1/94                  |  | \$500.00                                |
|  |  | Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) |  |                         |  |   |

See pages 15–16 for information on making post-election contributions to retire a candidate's debts.

